

BEFORE THE
CALIFORNIA BOARD OF OCCUPATIONAL THERAPY
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Petition to Revoke
Probation Against:

Case No. AL2009-84

ANJULI DILLON KELLEY,
A.K.A. ANJULI D. KELLEY
1375 Fresno Court
Broomfield, CO 80020
Occupational Therapist License No. OT
11186

Respondent.

DECISION AND ORDER

The attached Stipulated Surrender of License and Order is hereby adopted by the California Board of Occupational Therapy, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on November 10, 2010.

It is so ORDERED October 11, 2010.


FOR THE CALIFORNIA BOARD OF OCCUPATIONAL
THERAPY, DEPARTMENT OF CONSUMER AFFAIRS

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9 CALIFORNIA BOARD OF OCCUPATIONAL THERAPY
DEPARTMENT OF CONSUMER AFFAIRS
10 STATE OF CALIFORNIA

11 In the Matter of the Petition to Revoke
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14 Broomfield, CO 80020
Occupational Therapist License No. OT
15 11186

STIPULATED SURRENDER OF
LICENSE AND ORDER

16 Respondent.

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18 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this
19 proceeding that the following matters are true:

20 PARTIES

21 1. Heather Martin ("Complainant") is the Executive Officer of the California Board of
22 Occupational Therapy ("Board"). She brought this action solely in her official capacity and is
23 represented in this matter by Edmund G. Brown Jr., Attorney General of the State of California,
24 and by Nicholas Tsukamaki, Deputy Attorney General.

25 2. Anjuli Dillon Kelley, a.k.a. Anjuli D. Kelley ("Respondent"), is representing herself
26 in this proceeding and has chosen not to exercise her right to be represented by counsel.

27 3. On or about March 22, 2010, the Board issued Occupational Therapist License No.
28 OT 11186 to Respondent, immediately revoked the license, stayed the revocation, and placed

1 Respondent on probation for three years pursuant to certain terms and conditions of probation.
2 The Occupational Therapist License was in full force and effect at all times relevant to the
3 charges brought in Petition to Revoke Probation No. AL2009-84 and will expire on February 28,
4 2011, unless renewed.

5 JURISDICTION

6 4. Petition to Revoke Probation No. AL2009-84 was filed before the Board and is
7 currently pending against Respondent. The Petition to Revoke Probation and all other statutorily-
8 required documents were properly served on Respondent on July 15, 2010. A copy of Petition to
9 Revoke Probation No. AL2009-84 is attached as exhibit A and incorporated herein by reference.

10 ADVISEMENT AND WAIVERS

11 5. Respondent has carefully read and understands the charges and allegations in Petition
12 to Revoke Probation No. AL2009-84. Respondent also has carefully read and understands the
13 effects of this Stipulated Surrender of License and Order.

14 6. Respondent is fully aware of her legal rights in this matter, including the right to a
15 hearing on the charges and allegations in the Petition to Revoke Probation; the right to be
16 represented by counsel at her own expense; the right to confront and cross-examine the witnesses
17 against her; the right to present evidence and to testify on her own behalf; the right to the issuance
18 of subpoenas to compel the attendance of witnesses and the production of documents; the right to
19 reconsideration and court review of an adverse decision; and all other rights accorded by the
20 California Administrative Procedure Act and other applicable laws.

21 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
22 every right set forth above.

23 CULPABILITY

24 8. Respondent admits the truth of each and every charge and allegation in Petition to
25 Revoke Probation No. AL2009-84, agrees that cause exists for discipline, and hereby surrenders
26 her Occupational Therapist License No. OT 11186 for the Board's formal acceptance.

27 9. Respondent understands that by signing this stipulation she enables the Board to issue
28 an order accepting the surrender of her Occupational Therapist License without further process.

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CONTINGENCY

10. This stipulation shall be subject to approval by the Board. Respondent understands and agrees that counsel for Complainant and the staff of the Board may communicate directly with the Board regarding this stipulation and surrender without notice to or participation by Respondent. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be of no force or effect except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

11. The parties understand and agree that facsimile copies of this Stipulated Surrender of License and Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

12. This Stipulated Surrender of License and Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments, written or oral. This Stipulated Surrender of License and Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

13. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order:

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ORDER

IT IS HEREBY ORDERED that Occupational Therapist License No. OT 11186 issued to Respondent Anjuli Dillon Kelley, a.k.a. Anjuli D. Kelley, is surrendered and accepted by the California Board of Occupational Therapy.

14. The surrender of Respondent's Occupational Therapist License and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against

Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with the Board.

15. Respondent shall lose all rights and privileges as an occupational therapist in California as of the effective date of the Board's Decision and Order.

16. Respondent will be allowed to apply for reinstatement of her license two years after the effective date of the Decision and Order.

17. Respondent shall cause to be delivered to the Board both her wall license certificate and, if one was issued, pocket license on or before the effective date of the Decision and Order.

18. If Respondent ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations, and procedures for reinstatement of a revoked license in effect at the time the petition is filed, and all of the charges and allegations contained in Petition to Revoke Probation No. AL2009-84 shall be deemed to be true, correct, and admitted by Respondent when the Board determines whether to grant or deny the petition.

19. Respondent shall pay the Board its costs of investigation and enforcement in the amount of \$775.00 prior to issuance of a new or reinstated license.

ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Occupational Therapist License. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the California Board of Occupational Therapy.

DATED: 8/21/2010

Anjuli C. Kelley
ANJULI DILLON KELLEY
Respondent

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ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the California Board of Occupational Therapy of the Department of Consumer Affairs.

Dated: August 30, 2010

Respectfully submitted,

EDMUND G. BROWN JR.
Attorney General of California
FRANK H. PACOE
Supervising Deputy Attorney General



NICHOLAS TSUKAMAKI
Deputy Attorney General
Attorneys for Complainant

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